

**CALIFORNIA CIVIL RIGHTS LAW GROUP**

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DEMETRIC DI-AZ and OWEN DIAZ

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

DEMETRIC DI-AZ, OWEN DIAZ, and  
LAMAR PATTERSON,

Plaintiffs,

v.

TESLA, INC. dba TESLA MOTORS, INC.;  
CITISTAFF SOLUTIONS, INC.; WEST  
VALLEY STAFFING GROUP;  
CHARTWELL STAFFING SERVICES, INC.;  
and DOES 1-50, inclusive,

Defendants.

Case No. 3:17-cv-06748-WHO

**[PROPOSED] ORDER GRANTING  
PLAINTIFFS' ADMINISTRATIVE  
MOTION TO FILE DOCUMENTS  
UNDER SEAL IN SUPPORT OF  
PLAINTIFFS' OPPOSITION TO  
DEFENDANT NEXTSOURCE, INC.'S  
MOTION FOR SUMMARY JUDGMENT**

Date: December 18, 2019

Time: 2:00 p.m.

Courtroom: 2, 17th Floor

Judge: Hon. William H. Orrick

Trial Date: March 2, 2020

Complaint filed: October 16, 2017

**[PROPOSED] ORDER**

Pursuant to Local Rules 7-11 and 79-5, as well as this Court's Standing Order regarding administrative motions to seal, Plaintiffs Demetric Di-az and Owen Diaz have filed an administrative motion for an order sealing the physical copies in the Court's files of Exhibits A through Y to the Supplemental Declaration of Lawrence Organ in Support of Plaintiffs' Opposition to Defendant nextSource, Inc.'s Motion for Summary Judgment. According to the declaration filed by Plaintiffs' counsel, Lawrence Organ, in support of this Motion, Exhibits A through Y should be sealed for the foregoing reasons:

<b>Document</b>	<b>Basis for Sealing</b>
Exhibit A: NS000004	Marked confidential pursuant to Protective Order (Dkt. No. 50).
Exhibit B: Deposition of Plaintiff Owen Diaz	Marked confidential pursuant to Protective Order (Dkt. No. 50).
Exhibit C: NS000175 to NS000178	Marked confidential pursuant to Protective Order (Dkt. No. 50).
Exhibit D: TESLA-0001014 to TESLA-0001050	Marked confidential pursuant to Protective Order (Dkt. No. 50).
Exhibit E: TESLA-0000667 to TELSA-0000671	Marked confidential pursuant to Protective Order (Dkt. No. 50).
Exhibit F: TESLA-0000333	Marked confidential pursuant to Protective Order (Dkt. No. 50).
Exhibit G: NS000108 to NS000111	Marked confidential pursuant to Protective Order (Dkt. No. 50).
Exhibit H: NS000095 to NS000100	Marked confidential pursuant to Protective Order (Dkt. No. 50).
Exhibit I: TESLA-0000510	Marked confidential pursuant to Protective Order (Dkt. No. 50).
Exhibit J: TESLA-0000511	Marked confidential pursuant to Protective Order (Dkt. No. 50).
Exhibit K: TESLA-0000314 to TESLA-0000316	Marked confidential pursuant to Protective Order (Dkt. No. 50).
Exhibit L: Deposition of Demetric Di-Az	Marked confidential pursuant to Protective Order (Dkt. No. 50).
Exhibit M: Deposition of Lamar Patterson	Marked confidential pursuant to Protective Order (Dkt. No. 50).
Exhibit N: TESLA-0001003 to TESLA-0001005	Marked confidential pursuant to Protective Order (Dkt. No. 50).

Exhibit O: TESLA-0000060	Marked confidential pursuant to Protective Order (Dkt. No. 50).
Exhibit P: TESLA-0000626	Marked confidential pursuant to Protective Order (Dkt. No. 50).
Exhibit Q: NS000138 to NS000139	Marked confidential pursuant to Protective Order (Dkt. No. 50).
Exhibit R: CITISTAFF-0000050 to CITISTAFF-0000055	Marked confidential pursuant to Protective Order (Dkt. No. 50).
Exhibit S: NS000038 to NS000045	Marked confidential pursuant to Protective Order (Dkt. No. 50).
Exhibit T: NS000095 to NS000100	Marked confidential pursuant to Protective Order (Dkt. No. 50).
Exhibit U: NS000014	Marked confidential pursuant to Protective Order (Dkt. No. 50).
Exhibit V: CITISTAFF-0000009 to CITISTAFF-0000010	Marked confidential pursuant to Protective Order (Dkt. No. 50).
Exhibit W: TESLA-0000321 to TESLA-0000323	Marked confidential pursuant to Protective Order (Dkt. No. 50).
Exhibit X: TESLA-0000317	Marked confidential pursuant to Protective Order (Dkt. No. 50).
Exhibit Y: TESLA-0000905	Marked confidential pursuant to Protective Order (Dkt. No. 50).

Appearing the requested relief is warranted, this Court orders that:

1. Plaintiffs' Administrative Motion to File Documents Under Seal in Support of Plaintiffs' Opposition to Defendant nextSource, Inc.'s Motion for Summary Judgment is GRANTED.

2. The physical copies in the Court's files of Exhibits A through Y to the Supplemental Declaration of Lawrence Organ in Support of Plaintiffs' Opposition to Defendant nextSource, Inc.'s Motion for Summary Judgment shall be SEALED and remain sealed until further order of the Court.

IT IS SO ORDERED.

DATED: \_\_\_\_\_, 2019

\_\_\_\_\_  
The Honorable William Orrick  
United States District Court Judge